

AGENCY OF NATURAL RESOURCES
COMPLAINT/SPILL REPORT

COMPLAINT #: 2004WMD313
DATE: 9/9/04
DISTRICT: 1
TOWN: FLORENCE
PROGRAM: SPILLS
PRIORITY:
INVESTIGATOR:
DATE CLOSED:
CLOSURE CODE:

Date/Time: 1632 9/8/04

Person Taking Report: M R

LOCATION OF SPILL/INCIDENT:

Facility: OMYA ~~West~~ - East Plant
Road/Street/Highway: 312 Omya East Entrance
Town/City: Florence

PERSON MAKING REPORT/COMPLAINANT:

Name/Organization: Tom Sawyer OMYA

Address:

Telephone Number: (work): 770-7608 (home):

Emergency: Yes No

Nature of Incident: found solid waste/drums/tv/metal Incident Code: 15

Date/Time of Incident: 9/8/04

Type of Contaminant: solid waste Quantity:

Responsible Parties (RPs): OMYA

RP's Telephone Number: (work): (home):

OTHER INFORMATION (including directions)/ACTIONS TAKEN: Inspection of OMYA property revealed abandoned trailer, appliances, drums, metal. OMYA will investigate & arrange for proper disposal.

Case Assigned/Referred To: Date/Time:



State of Vermont

Department of Fish and Wildlife
Department of Forests, Parks and Recreation
Department of Environmental Conservation
State Geologist
RELAY SERVICES FOR HEARING IMPAIRED
1-800-253-0191 TDD>VOICE
1-800-253-0195 VOICE>TDD

AGENCY OF NATURAL RESOURCES
Department of Environmental Conservation
Waste Management Division
103 South Main Street/West Office
Waterbury, Vermont 05671-0404
(802) 241-3888

Memorandum

To: The File
From: Michael B. Smith, Environmental Analyst *MBS*
Date: 10 September 2004
RE: OMYA East Plant/Florence Site Visit

I traveled to the OMYA Florence, VT facility today to view a reported waste dump and tractor trailer with drums stored inside located in the woods on the OMYA property. I arrived on site at the OMYA East Plant engineering offices at approximately 8:00 am. Weather was cloudy with temperatures in the 60's (°f).

I met with Thomas J. Sawyer of OMYA. He guided me on a tour of the reported waste dump and tractor trailers. I saw the waste dump/pile and took digital pictures of the pile. The waste pile appeared to consist primarily of waste metals including at least one crushed drum and some doors or windows. I also saw at least one plastic bucket in the waste pile. There were fresh tire tracks in the soil leading to the waste pile. I asked Mr. Sawyer about the tracks and he said that OMYA had started doing some work on the pile. I am assuming that OMYA will be cleaning up the pile.

The hot water heater and freezer that were reported to be in the pile had been removed from the pile to a location on a dirt road/trail that runs near the pile.

The pile itself looked old with the waste metals visibly rusted. There was no readily apparent vegetation growing through the top of the pile although there was some vegetation on the sides of the pile. The vegetation surrounding the pile was overgrown and looked undisturbed except for an area that OMYA had just cleared to gain access to the tractor trailers in the woods (described below). A road or track was established leading to the waste pile, but I was not able to determine its condition prior to OMYA's work to remove the drums (described below) and waste from the waste pile.

Mr; Sawyer then showed me two old tractor trailers (only the trailers were present) that were

located in the woods adjacent to the waste pile. Vegetation had recently been cut to obtain access to the trailers. As reported, old drums (a mixture of 55 gallon metal and other types of drums) had been in one of the trailers. OMYA had removed the drums and sampled the contents. Until sample results are received and the waste is characterized, the waste drums are being stored in a safe location on site. Other waste metals were still present in the trailers. I asked Mr. Sawyer for the results of the drum content analytical testing.

Mr. Sawyer then showed me an old dirt road that lead around the waste pile to the old Pittsfield-Italian Quarry. This road used to be the access to the quarry. It did not look actively used. He also showed me a small wetland near the quarry. I did not see any waste metals in the wetland.

I left the site at approximately 8:50 am.







Florence Road, P.O. Box 10
Florence, Vermont 05744
Tel. (802) 770-7608
Fax. (802) 770-7589

OMYA Inc. – Verpol Plant

October 5, 2004

Mr. Michael Smith
VTDEC – Waste Mgmt. Division
Sites Mgmt. Section
103 South Main Street
West Office Building
Waterbury, VT 05671-0404

Re: East Plant Clean-Up Project
Omya Inc. - Florence, Vermont

Dear Mr. Smith:

On Wednesday, September 8th, Omya Inc. became aware of an area located in a wooded portion of its property southeast of the East Plant on Whipple Hollow Road in Florence, Vermont (Attachment #1 – Site Location Map) where apparently unwanted plant equipment and materials had accumulated. Based on interviews with plant personnel, and from the nature of the equipment/materials identified, it appears that the accumulation area did not result from recent operations.

Omya initiated a clean-up of the subject area on Monday, September 13th. Materials were segregated into "materials for disposal" and "materials for recycling". The "materials for disposal" were categorized based on physical appearance, historical process/industry knowledge, or laboratory analysis. They included:

1. 240 yards of general demolition and construction debris; and
2. Fourteen 55-gallon drums, two 30-gallon drums and one 5-gallon drums containing material to be disposed as waste. Of these drums, thirteen 55-gallon drums, one 30-gallon drum and one 5-gallon drum are being disposed of as VT99 (non-hazardous) and one 55-gallon drum and one 30-gallon are being disposed of as D001 (ignitable).

The "material for recycling" included the following items:

1. 42 tons of scrap metal; and
2. 70 yards of tires.

The project subcontractors and the tasks they performed are outlined in Table 1. Removal activities were performed in a manner as to minimize the impact to the natural surroundings (Attachment #2 – Photo Documentation). Removal activities were completed on Friday, September 17th. Seeding is complete. Drum pick-up is scheduled for October.

located in the woods adjacent to the waste pile. Vegetation had recently been cut to obtain access to the trailers. As reported, old drums (a mixture of 55 gallon metal and other types of drums) had been in one of the trailers. OMYA had removed the drums and sampled the contents. Until sample results are received and the waste is characterized, the waste drums are being stored in a safe location on site. Other waste metals were still present in the trailers. I asked Mr. Sawyer for the results of the drum content analytical testing.

Mr. Sawyer then showed me an old dirt road that lead around the waste pile to the old Pittsfield-Italian Quarry. This road used to be the access to the quarry. It did not look actively used. He also showed me a small wetland near the quarry. I did not see any waste metals in the wetland.

I left the site at approximately 8:50 am.

**TABLE 1
WASTE DISPOSAL & MATERIAL RECYCLING LOCATIONS**

| WASTE | QUANTITY | TRANSPORTER | DISPOSAL/RECYCLING FACILITY |
|--|--|--|--|
| General Construction & Demolition Debris (Solid Waste) | 240 yards | Casella Waste Management P.O. Box 819 West Rutland, VT 05777 | <u>Intermediate Handling Facility:</u> Rutland County Solid Waste District Regional Transfer Station Gleason Road Rutland, VT 05701 <u>Receiving Disposal Facility:</u> Clinton County Landfill Sand Road, Route 31 Schuyler Falls, NY 12985 |
| Scrap Metal | 42 tons (Including metal from abandoned trailers) | Northern Metals Route 7B, P.O. Box 26 N. Clarendon, VT 05759 | Hudson Metal Recycling 11 N Ferry St Albany, NY 12207-2404 |
| Scrap Tires | 70 yards | Northern Metals Route 7B, P.O. Box 26 N. Clarendon, VT 05759 | George Apkins & Sons, Inc. 80 State Street N. Adams, MA 01247 |
| Non-Hazardous Waste (VT99 Solids & VT99 Liquids) | Thirteen 55-Gallon Drums | Clean Harbors Environmental Services 338 Commerce Street Williston, VT 05495 | Spring Grove Resource Recovery 4879 Spring Grove Avenue Cincinnati, OH 45232 |
| Hazardous Waste (D001 Liquid) | One 55-Gallon Drum | Clean Harbors Environmental Services 338 Commerce Street Williston, VT 05495 | Spring Grove Resource Recovery 4879 Spring Grove Avenue Cincinnati, OH 45232 |
| Hazardous Waste (D005 Barium Sulfate) | One 5-Gallon Drum Lab-Pack | Clean Harbors Environmental Services 338 Commerce Street Williston, VT 05495 | Clean Harbors Reidsville, LLC 208 Watlington Industrial Drive Reidsville, NC 27320 |

NON-HAZARDOUS & HAZARDOUS WASTE INVENTORY
EAST PLANT - EPA ID# VTD002080950
ONE-TIME EVENT (CLEAN-UP)

| MATERIAL | QUANTITY | MATRIX | COMPOSITION | C.S. | EPA Waste Code |
|----------------------------------|----------------------|--------|--|--------------------------------------|--|
| DUOMAC T | 6 55-Gal. Drums | Solid | 85-95% N-Tallowalkyl-1,3-diaminopropane diacetates 5-15%Tallowalkylamine acetates | 61791-54-6 61790-60-1 | VT99 |
| Boiler Treatment Chemical | 3 ✓ 55-Gal. Drums | Powder | Sodium Phosphate | 7601-54-9 | VT99 |
| Alkazine TO-DT Flotation Reagent | 1 55-Gal. Drum | Powder | Calcium Carbonate Hydroxyethyl Imidazoline Amine Acetate | 471-34-1 61791-39-7 61791-54-6 | VT99 |
| Amber Powder | 1 55-Gal. Drum | Powder | Phosphate | 14265-44-2 | VT99 |
| Yellow Fluid | 1 55-Gal. Drum | Liquid | Isopentane ✓ Nonane | 78-78-4 111-84-2 | flammable liquid D001 |
| Dispex A40 | 2 55-Gal. Drums | Liquid | Polyacrylic Acid Polyacrylamide | "9003-01-4 "9005-05-8 | non-hazardous VT99 pH = 4.5 non-corrosive |
| Barytes #22 | 1 5-Gal. Drum | Powder | Barium Sulfate | 7727-43-7 | D005 |

Florence Road, P.O. Box 10
Florence, Vermont 05744
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Fax. (802) 770-7589

OMYA Inc. - Verpol Plant

November 3, 2004

Mr. Michael Smith
VTDEC – Waste Mgmt. Division
Sites Mgmt. Section
103 South Main Street
West Office Building
Waterbury, VT 05671-0404

Re: East Plant Clean-Up Project
Omya Inc. - Florence, Vermont

NOV 4 10 22 AM '04
WASTE MANAGEMENT

Dear Mr. Smith:

This letter is intended to satisfy the Vermont Department of Environmental Conservation (VT DEC) – Waste Management Division's request for additional information with regards to the Omya, Inc. East Plant Clean-Up Project.

As per your October 7, 2004 response letter, the following information is enclosed:

- Waste Characterization Laboratory Report for unknown drum materials;
- Waste Disposal & Material Recycling Facility Locations;
- Non-Hazardous & Hazardous Waste Inventory; and
- Corresponding Waste Manifests.

* Note: As we discussed, the barium sulfate manifest is to follow.

Clean Harbors Environmental Services, Inc. of Williston, Vermont provided disposal services on October 26, 2004. Copies of the Uniform Hazardous Waste Manifests were mailed to the VT DEC (Generator State) in accordance with State and Federal regulatory requirements.

In response to the status of the abandoned trailers, Northern Metal of North Clarendon, Vermont dismantled the two trailers and segregated the materials accordingly. The materials were transported offsite and recycled or disposed of appropriately as scrap metal, scrap tires and general construction / demolition debris. This event was conducted simultaneously with the clean-up of the subject area initiated by Omya, Inc. on September 13, 2004.

Lastly, enclosed please find the requested photographs of the subject area taken by Covell & Associates, LLC and submitted as part of their September 23, 2004 report.

November 3, 2004

If you have any questions with regard to the enclosed information, please call me at (802) 770-7608.

Sincerely,

A handwritten signature in black ink, appearing to read "Thomas J. Sawyer". The signature is fluid and cursive, with a long horizontal flourish extending to the right.

Thomas J. Sawyer
EHS Manager
Verpol Plant, Omya Inc.

Enclosures:



State of Vermont

Department of Fish and Wildlife
Department of Forests, Parks and Recreation
Department of Environmental Conservation
State Geologist
RELAY SERVICES FOR HEARING IMPAIRED:
1-800-253-0191 TDD-Voice
1-800-253-0195 Voice > TDD

AGENCY OF NATURAL RESOURCES
Department of Environmental Conservation
Waste Management Division
103 South Main Street/West Office
Waterbury, Vermont 05671-0404
(802) 241-3888

10 November 2004

Mr. Thomas J. Sawyer
EHS Manager, Verpol Plant
Omya, Inc.
P.O. Box 10
Florence, VT 05744

Dear Mr. Sawyer:

Thank you for your 3 November 2004 letter report detailing the disposal and testing results of the solid waste and drums discovered at the Omya facility. It appears that the waste has been removed from the site and correctly disposed of according to applicable regulations. Please note that the pictures of the site you submitted with this report as per my request were not very legible in black and white. Please re-submit the pictures in either clear color or electronic format.

In general, the description of how the wastes were shipped is very clear. However, it is less clear in regards to the reported shipping of 1 five gallon drum of barium sulfate powder and 2 - 55 gallon drums of Polyacrylic Acid and Polyacrylamide. The table on shipping found directly after Table 1 does not appear to clearly match the descriptions of the drum contents given on the laboratory report in regards to these constituents. Also, the laboratory reports describe ½ drum of mineral oil. Which drum was this shipped in (I assume it was shipped as non-hazardous waste)? Please clarify these issues.

Thank you for your continued cooperation in this process. I will look forward to receiving the above information. Please call me if you have any questions.

Sincerely,

A handwritten signature in black ink, appearing to read 'Michael B. Smith', with a long, sweeping underline that extends to the right.

Michael B. Smith
Hydrogeologist



LABORATORY REPORT

Proctor Analytical Lab

| |
|----------------------------|
| REPORT NUMBER 2004-0763 |
|----------------------------|

| REQUESTED BY | SAMPLE(S) | SAMPLE NO |
|-------------------------------------|---|---|
| DEPARTMENT North American Plants | 04-2141 UNKNOWN #1 6/drums - Yellow Waxy solid ✓ | FROM 04-2141 |
| OMYA PLANT Omya Inc. Florence | 04-2142 UNKNOWN #2 3 drums - Orange Powder ✓ | THROUGH 04-2147 |
| NAME Tom Sawyer | 04-2143 UNKNOWN #3 1 drum - Lt. Brown Powder ✓ | CMS NUMBER |
| PHONE NUMBER 608 | 04-2144 UNKNOWN #4 1 drum - Mix Powder + Absobant ✓ | DATE COMPLETED 9/10/04 |
| REQUESTED 9/9/04 | 04-2145 UNKNOWN #5 5 Gallons - Yellow Liquid 55 gal. - Blue ✓ | SAMPLE DISPOSITION Return to Submitter |
| CAPABLE 9/9/04 | 04-2146 UNKNOWN #6 1/5 Drum - Yellow/Clear Liquid | DATE REPORT PRINTED 09/10/04 |
| CUSTOMER Not Applicable | COPIES TO TOM SAWYER | |

Background Information

Identify unknow waste samples from Omya East Plant and Trailer clean up.

Laboratory Results

| PRODUCT SAMPLE # | UNITS | UNKNOWN #1 04-2141 | UNKNOWN #2 04-2142 | UNKNOWN #3 04-2143 | UNKNOWN #4 04-2144 | UNKNOWN #5 04-2145 |
|------------------|-------|-----------------------|-----------------------|-----------------------|-----------------------|-----------------------|
| TESTS | | | | | | |
| FT-IR Analysis | | - NOTE - | - NOTE - | - NOTE - | - NOTE - | - NOTE - |
| FT-IR Spectra | | not attached | not attached | not attached | not attached | not attached |

Laboratory Results

| PRODUCT SAMPLE # | UNITS | UNKNOWN #6 04-2146 | UNKNOWN #7 04-2147 | | | |
|------------------|-------|-----------------------|-----------------------|--|--|--|
| TESTS | | | | | | |
| FT-IR Analysis | | - NOTE - | - NOTE - | | | |
| FT-IR Spectra | | not attached | not attached | | | |

- 04-2141 FT-IR Analysis The infrared spectrum of a yellowish waxy material (#1) is similar to Duomac-T.
- 04-2142 FT-IR Analysis The spectrum of the orange/brown powder (#2) is similar to a dibasic sodium phosphate which most-likely got rust-stained from the drums. (3)
- 04-2143 FT-IR Analysis The light brown solid material (#3) effervesced almost completely in hydrochloric acid which indicated the presence of carbonate, containing flotation agent Alkazine TO-DT and rust particles.
- 04-2144 FT-IR Analysis Amber colored powder (#4) was composed of rust-stained carbonate (rapid effervescence in hydrochloric acid) and most-likely a phosphate.
- 04-2145 FT-IR Analysis Yellow Liquid (#5) was identified as isopentane.
- 04-2146 FT-IR Analysis Yellow clear liquid (#6) was close to nonane.
- 04-2147 FT-IR Analysis Brown liquid (#7) was identified as mineral oil. (BBS)

Florence Road, P.O. Box 10
Florence, Vermont 05744
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OMYA Inc. – Verpol Plant

November 17, 2004

Mr. Michael Smith
VTDEC – Waste Mgmt. Division
Sites Mgmt. Section
103 South Main Street
West Office Building
Waterbury, VT 05671-0404

Re: East Plant Clean-Up Project
Omya Inc. - Florence, Vermont

Dear Mr. Smith:

This letter is intended to respond to the questions posed in your November 10, 2004 letter with regards to the Omya Inc. East Plant Clean-Up Project.

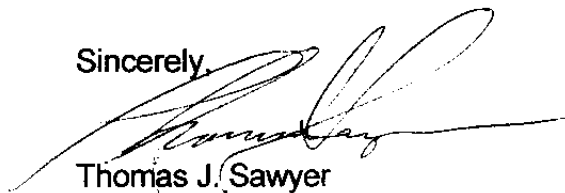
The enclosed Non-Hazardous & Hazardous Waste Inventory Table has been revised to clarify the relationship between the waste drums, waste characterization laboratory report and the corresponding waste manifests. As noted on the Table, the mineral oil was added to the East Plant "Used Oil" Tank whose contents are recycled under an existing contract with NOCO Energy Corp. of Tonawanda, New York.

As previously indicated, the 5-gallon drum of barium sulfate was disposed of by Clean Harbors Environmental Services, Inc. of Williston, Vermont. Discrepancies its waste manifest that required corrections by Clean Harbors prevented it from being submitted before now. The reissued waste manifest is enclosed.

Lastly, enclosed please find the requested color copies of the photographs of the subject area.

If you have any questions with regard to the enclosed information, please call me at (802) 770-7608.

Sincerely,



Thomas J. Sawyer
EHS Manager
Verpol Plant, Omya Inc.

**NON-HAZARDOUS & HAZARDOUS WASTE INVENTORY
EAST PLANT - EPA ID# VTD002080950
ONE-TIME DISPOSAL EVENT (CLEAN-UP)**

| | | | | | |
|-------------------------------------|----------------------|--------|---|--------------------------------------|--|
| DUOMAC T | 6 55-Gallon Drums | Solid | 85-95% N-Tallowyl-1, 3-diaminopropane diacetates 5-15% Tallowalkylamine acetates Lab Characterization - Unknown #1 Manifest #VT-0168850 Item b. - Fatty amine acetates salts | 61791-54-6 61790-60-1 | VT99 |
| Boiler Treatment Chemical | 3 55-Gallon Drums | Powder | Sodium Phosphate Lab Characterization - Unknown #2 Manifest #VT-0168851 Item a. - Non DOT Regulated, Non DOT Hazardous | 7601-54-9 | VT99 |
| Alkazine TO-DT Flotation Reagent | 1 55-Gallon Drums | Powder | Calcium Carbonate Hydroxylethyl imidazoline Amine Acetate Lab Characterization - Unknown #3 Manifest #VT-0168851 Item a. - Non DOT Regulated, Non DOT Hazardous | 471-34-1 61791-39-7 61791-54-6 | VT99 |
| Amber Powder | 1 55-Gallon Drums | Powder | Phosphate Lab Characterization - Unknown #4 Manifest #VT-0168850 Item c. - Non DOT Regulated, Non DOT Hazardous | 14285-44-2 | VT99 |
| Yellow Fluid | 1 55-Gallon Drums | Liquid | Isopentane Nonane Lab Characterization - Unknowns #5 & #6 (combined) Manifest #VT-0168850 Item a. - Waste Acetone | 78-78-4 111-84-2 | Flammable Liquid D001 |
| Dispex A40 | 2 55-Gallon Drums | Liquid | Polyacrylic Acid Polyacrylamide Labelled Drums - No Lab Characterization Necessary Manifest #VT-0168850 Item d. - Polycarboxylate, Polyacrylate | "9003-01-4 "9005-05-8 | Non-Hazardous VT99 pH = 4.5 Non-Corrosive |
| Barytes #22 | 1 5-Gallon Drum | Powder | Barium Sulfate Labelled Drum - No Lab Characterization Necessary Manifest #VT-0162739 Item a. - Waste Barium Compounds | 7727-43-7 | D005 |

***NOTE:**

The Drum of Brown Liquid - Unknown #7 was characterized as Mineral Oil. This oil was added to the East Plant Used Oil Tank and will be recycled under the existing Omya Contract with NOCO Energy Corp. of Tonawanda, New York.





CLEAN WASTE

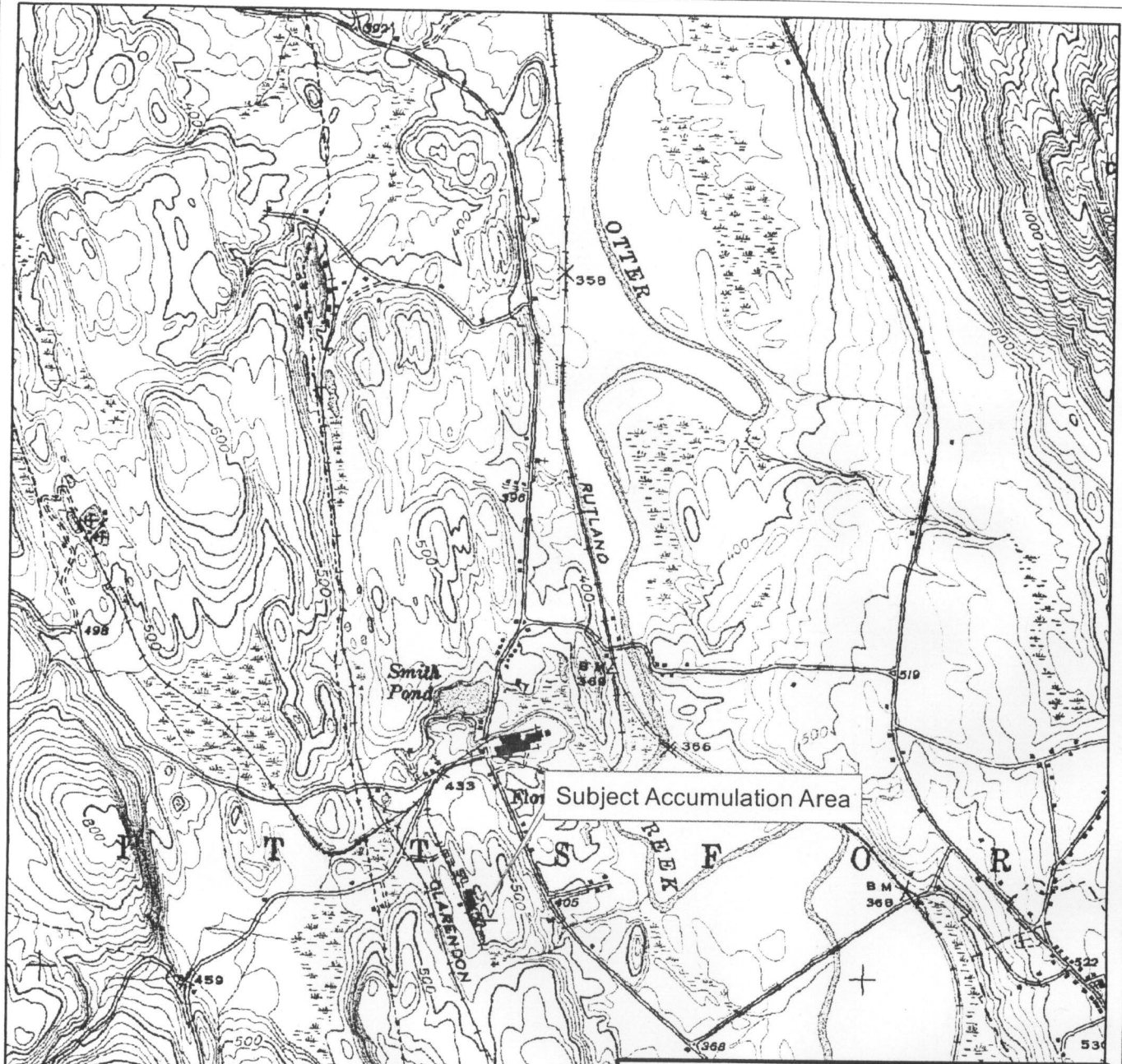
CLEAN WASTE











Subject Accumulation Area



TITLE: FIGURE 1. SITE LOCATION MAP

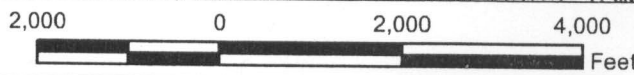
Source: USGS Topographic Map
PROCTOR Quadrangle (Last Revised: 1972)

SITE:

OMYA East Plant
Whipple Hollow Rd., Florence, Vermont
Site Lat Long NAD83: 43.7169, -73.0567



QUADRANGLE LOCATION



DRAWN BY: DH

9/27/2004

SCALE: 1in = 2000ft

APPROVED BY: KL

FILE: OMYAoloc.mxd